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WT Docket No. 16-421  
Comment Sought on Streamlining Deployment of Small Cell Infrastructure  
Mobilite, LLC Petition for Declaratory Ruling

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington D.C. 20554

Dear Ms. Dortch:

The purpose of this letter is to provide comment for the FCC's consideration in establishing policy for the streamlining of small cell tower siting applications.

I strongly urge you to establish policies that grant localities sufficient time for assessing cell tower siting applications. It is unrealistic to think the county can assess the validity of multiple/batched site applications in only 90 days.

- For example, Crown Castle recently submitted 170 small cell tower applications for Montgomery County – at the same time – too many to consider within 90 days (especially considering my subsequent comments).
- Very clearly the number of applications within a batch should be limited, as should the number of batches, so that inaccuracies and need can be assessed.

I have reviewed recent applications by Crown Castle to Montgomery County, MD out of self-interest, as one cell tower is slated for the right of way in front of my property. My comments reflect my observations – which in all likelihood are representative of other situations.

The applications presented by Crown Castle are fraught with inaccuracies – another indication of the need for time to assess the applications. For example:

- The applications include incorrect addresses:
  - In some cases it has been noted the address doesn't exist; in my case it lists my neighbor's address...and yet, Crown Castle has already placed underground elements related to the proposed cell tower in front of my home (not listed on the application).
- The applications are deceptive in their intent:
  - The cell tower slated for my neighbor would supposedly replace a 12' lamppost in the right of way between my and my neighbor's property. And yet, this would put the tower within 27 feet of my neighbor's home...so it is

clear they do not plan to use/replace an existing structure, but to move it to the front of my home...30 feet from my house

- The tower applications for my neighborhood state the towers will have 4" (inches) antennae. And yet, all other small cell tower applications indicate the antennae will be 4' (feet). I've seen these small cell towers – the antennae are never 4" (inches).

Additionally, Crown Castle has been deceptive in presenting applications and communicating with the community, as well as the look of the proposed small cell towers and should not be allowed to railroad their applications to approval:

- Construction has already taken place in front of my home. This is indicative of their expectations for approval without considered review.
- Photo-shopped photographs of small cell towers provided by Crown Castle are deceptive, presenting them as fairly innocuous structures – who could object? And yet we all know this is not the case.

Many of the cell tower applications are for neighborhoods with underground utilities – there are no telephone poles on which to conveniently locate the equipment. Unsupervised approval of individual applications will definitely change the look and feel of such neighborhoods. Thus, counties must have time to assess and advise on the height, circumference, and location of the cell tower itself, as well as associated equipment, so that homeowners' interests are protected.

Lastly, time is necessary for the county to ascertain whether the site legitimately addresses a need, and/or is optimally located to protect adjacent homeowners:

- For example, Crown Castle has not established that a significant gap in service exists in my neighborhood - neither my neighbors nor I experience such a gap. Especially for residential, non-commercial neighborhoods where the availability of in-home wi-fi precludes a need for "public" access, no gap exists.
- Nor has Crown Castle established that no alternative locations are possible. Placing small cell towers in neighborhoods with small lots and underground utilities will negatively affect property values and places an undue burden on specific, individual homeowners. For example, cell towers exist on the next street (major road with telephone poles); there's significant acreage of woods behind my home; there are non-buildable lots in the neighborhood. Why haven't any of these sites been considered?

I very much appreciate your consideration and urge you to preserve the right of counties to exercise their due diligence for reviewing applications for small cell towers slated for residential neighborhoods.

Sincerely,  
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